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[additional counsel on signature page]

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

MICHAEL DRIEU, Individually and On
 Behalf of All Others Similarly Situated,

Plaintiff,

v.

ZOOM VIDEO COMMUNICATIONS, INC.,
 ERIC S. YUAN, and KELLY
 STECKELBERG,

Defendants.

Case No. 3:20-CV-02353-JD

**STIPULATION AND [PROPOSED] ORDER
 CONSOLIDATING CASES, EXTENDING TIME
 TO RESPOND TO COMPLAINT, AND
 CONTINUING CASE MANAGEMENT
 CONFERENCE**

KIM BRAMS, Individually and On Behalf of
 All Others Similarly Situated,

Plaintiff,

v.

ZOOM VIDEO COMMUNICATIONS, INC.,
 ERIC S. YUAN, and KELLY
 STECKELBERG,

Defendants.

Case No. 3:20-CV-02396-JD

1 purposes (together, the “Consolidated Action”). The consolidated action shall be captioned: “*In re*
 2 *Zoom Securities Litigation*” and shall be maintained under Master File No. 3:20-CV-02353-JD.
 3 Case 3:20-CV-02396-JD shall be administratively closed.

4 **2.** Defendants are not required to respond to the complaint in any action consolidated
 5 into this action, other than a consolidated complaint or a complaint designated as the operative
 6 complaint.

7 **3.** Within ten (10) days after the Court appoints a lead plaintiff, the lead plaintiff and
 8 Defendants will submit to the Court a proposed schedule for the filing of a consolidated complaint
 9 and the time for Defendants’ response thereto.

10 **4.** Subject to approval of the Court, the Case Management Conference set for July 9,
 11 2020 in *Drieu*, shall be continued to a date following the resolution of any motion to dismiss the
 12 consolidated complaint.

13 **5.** Defendants deny the allegations in the complaints and expressly reserve all rights,
 14 defenses and or other objections to the complaints, except insufficient service of process.

15
 16 Dated: May 6, 2020

COOLEY LLP

17
 18 /s/ Patrick E. Gibbs
 19 Patrick E. Gibbs

20 *Attorneys for Defendants Zoom Video*
 21 *Communications, Inc., Eric S. Yuan, Kelly*
 22 *Steckelberg*
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1 Dated: May 6, 2020

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2
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Attorneys for Plaintiff Michael Drieu

1 Dated: May 6, 2020

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Attorneys for Plaintiff Kim Brams

17 Pursuant to Civil Local Rule 5-1(i)(3), all signatories concur in filing his stipulation.

18 Dated: May 6, 2020

20 /s/Patrick E. Gibbs

Patrick E. Gibbs

[PROPOSED] ORDER

PURSUANT TO STIPULATION, **IT IS SO ORDERED.**

DATED: _____, 2020

HONORABLE JAMES DONATO
UNITED STATES DISTRICT JUDGE